Smith, Corey (TAX)

From:	Smith, Corey (TAX)
Sent:	Tuesday, November 1, 2022 2:03 PM
To:	Callaway, David R.; Pitman, Michael (USACAN); Magnani, Christopher (TAX); Langston, Lee F. (TAX); Bourget, Boris (TAX)
Cc:	Strassberg, Richard M; Fondo, Grant P; Ewald, Sylvia; Kim, Nicole
Subject:	RE: USA v. Kepke, Case No. 3:21-CR-00155-JD -- Supplemental Disclosure for Defense Expert Rodney Read

David

We continue in our position that his disclosure as a basis of Mr. Read's proposed expert testimony is not adequate. This disclosure does not refer to any evidence or facts in this case, or the structures that the Defendant created and managed for Robert Smith. Nor does it refer to any of the substantive transactions in this case. It appears to simply be a treatise on foreign trusts and the taxation thereof. We are not sure how this is relevant, and it appears to be nothing more than Mr. Read's legal opinions.

Corey J. Smith
Senior Litigation Counsel
Tax Division
(202) 514-5230

From: Callaway, David R. <DCallaway@goodwinlaw.com>
Sent: Saturday, October 29, 2022 6:10 PM
To: Pitman, Michael (USACAN) <mpitman@usa.doj.gov>; Smith, Corey (TAX) <corey.smith@usdoj.gov>; Magnani, Christopher (TAX) <Christopher.Magnani@usdoj.gov>; Langston, Lee F. (TAX) <Lee.F.Langston@usdoj.gov>; Bourget, Boris (TAX) <Boris.Bourget@usdoj.gov>
Cc: Strassberg, Richard M <RStrassberg@goodwinlaw.com>; Fondo, Grant P <GFondo@goodwinlaw.com>; Ewald, Sylvia <SEwald@goodwinlaw.com>; Kim, Nicole <NicoleKim@goodwinlaw.com>
Subject: [EXTERNAL] RE: USA v. Kepke, Case No. 3:21-CR-00155-JD -- Supplemental Disclosure for Defense Expert Rodney Read

Gentlemen,

Hearing no comments or objections, just a quick note to confirm that the draft supplemental disclosure I sent to you on Wednesday (copy attached) should be considered our final supplemental disclosure for Mr. Read. (Sorry, I tried to send this to you yesterday but found it just now, stuck in my Outbox.)

I hope you all are having a nice weekend.

Dave Callaway

From: Callaway, David R.
Sent: Wednesday, October 26, 2022 7:17 PM

To: 'Pitman, Michael (USACAN)' <Michael.Pitman@usdoj.gov>; 'corey.smith@usdoj.gov' <corey.smith@usdoj.gov>; 'christopher.magnani@usdoj.gov' <christopher.magnani@usdoj.gov>; 'lee.f.langston@usdoj.gov' <lee.f.langston@usdoj.gov>; 'boris.bourget@usdoj.gov' <boris.bourget@usdoj.gov>
Cc: Strassberg, Richard M <RStrassberg@goodwinlaw.com>; Fondo, Grant P <GFondo@goodwinlaw.com>; Ewald, Sylvia <SEwald@goodwinlaw.com>; Kim, Nicole <NicoleKim@goodwinlaw.com>
Subject: FW: USA v. Kepke, Case No. 3:21-CR-00155-JD -- Supplemental Disclosure for Defense Expert Rodney Read (DRAFT)

Gentlemen,

Please see the attached draft letter containing additional bases and reasons for the opinions of defense expert Rodney Read. As noted in the final paragraph, we are sending this to you a couple of days early to give us time to meet and confer in the unlikely event you should find any of these disclosures insufficient.

Thanks. I hope you all have a good evening.

Dave Callaway

David R. Callaway

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